



THE CITY OF NEW YORK  
**LAW DEPARTMENT**

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NEW YORK, NY 10007

Hon. Sylvia O. Hinds-Radix  
*Corporation Counsel*

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May 22, 2023

**Via ECF**

Honorable Loretta A. Preska  
United States District Court  
Southern District of New York  
500 Pearl Street  
New York, New York 10007

Re: Carol Hasday v. City of N.Y. et al., 19-CV-10239 (LAP)

Dear Judge Preska:

I am a Senior Counsel in the Office of Hon. Sylvia O. Hinds-Radix, Corporation Counsel of the City of New York, attorney for defendants City of New York and Sherry S. Chan in the above-referenced matter. I write respectfully to request a 30-day extension of time for defendants to submit their summary judgment pre-motion conference letter, from May 30, 2023, to June 30, 2023. This request, which is the first of such request, is submitted with plaintiff's consent.

This request is being made because the parties have completed discovery but are once again discussing settlement. This extension of time will allow the parties to continue those discussions without incurring additional expenses related to motion practice. As such, I respectfully request that the Court extend the pre-motion conference deadline to June 30, 2023.

I thank the Court for its attention to this matter.

**SO ORDERED**

*Loretta A. Preska*  
LORETTA A. PRESKA  
UNITED STATES DISTRICT JUDGE

Respectfully submitted,  
*/s/ Maria Fernanda DeCastro*  
Maria Fernanda DeCastro  
*Senior Counsel*

CC: **By ECF**

*May 23, 2023*  
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